Date: <u>June 7, 2022</u>

City and State: Rochester, New York

## United States District Court

#### for the

#### Western District of New York

**United States of America** 

Case No. 22-MJ-602

v.

# MATTHEW SHULMAN, Defendant

#### CRIMINAL COMPLAINT

- I, <u>GREGORY F. SCHMITTER</u>, the complainant in this case, state that the following is true to the best of my knowledge and belief: That between in or about May 4, 2021 through June 7, 2022, in the Western District of New York and elsewhere, the defendant, MATTHEW SHULMAN:
- (1) did knowingly attempt to employ, use, persuade, induce, entice and coerce a minor to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, which depictions were produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce, and which depictions were transported in and affecting interstate and foreign commerce, including by computer, in violation of 18 U.S.C. §§ 2251(a) and (e);
- (2) did knowingly distribute, receive and attempt to receive, child pornography that had been transported in and affecting interstate and foreign commerce, including by computer, in violation of 18 U.S.C. § 2252A(a)(2)(A); and
- (3) did knowingly possess and access with intent to view, and attempt to possess and access with intent to view, material that contained images of child pornography, that had been transported using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, including by computer, and that were produced using materials that had been shipped and transported in and affecting interstate and foreign commerce, in violation of 18 U.S.C. § 2252A(a)(5)(B).

#### SEE ATTACHED AFFIDAVIT OF TASK FORCE OFFICER GREGORY F. SCHMITTER, HSI.

This Criminal Complaint is based on these facts:   ☑ Continued on the attached sheet.	22/2
	Complainant's signature
	GREGORY F. SCHMITTER, TFO, (HSI)
	Printed name and title
Affidavit and Criminal Complaint submitted electronically	
by email in .pdf format. Oath administered, and contents	
and signature, attested to me as true and accurate	Λ
telephonically pursuant to Fed.R.Crim. P. 4.1 and 4(d) on:	(1 414)

MARK W. PEDERSEN

UNITED STATES MAGISTRATE JUDGE

Printed name and title

#### **AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT**

STATE OF NEW YORK	)
COUNTY OF MONROE	)
CITY OF ROCHESTER	)

I, GREGORY F. SCHMITTER, being duly sworn, depose and state:

- 1. I am an Investigator with the New York State Police (NYSP) and am a Task Force Officer with the Department of Homeland Security, Homeland Security Investigations (HSI). I have been employed by the NYSP since August 2007 and have been a Task Force Officer since December 2019. I am responsible for investigating crimes involving child exploitation, including violations of 18 U.S.C. §§ 2251(a) (Production of Child Pornography); 2252A(a)(2)(A) (Receipt and Distribution of Child Pornography); and 2252A(a)(5)(B) (Possession of Child Pornography).
- 2. This affidavit is made in support of a criminal complaint charging MATTHEW SHULMAN with Attempted Production of Child Pornography, in violation of 18 U.S.C. § 2251(a); Receipt and Attempted Receipt and Distribution of Child Pornography, in violation of 18 U.S.C. § 2252A(a)(2)(A); and Possession and Attempted Possession of Child Pornography, in violation of 18 U.S.C. § 2252A(a)(5)(B).
- 3. The information contained in this affidavit is based upon my personal knowledge and observations, my training and experience, conversations with other law enforcement officers, and my review of documents and records.
- 4. Because this affidavit is submitted for the limited purpose of establishing probable cause to secure a criminal complaint, I have not included every fact known to me as

a result of this investigation. Rather, I have set forth facts that I believe are necessary to establish probable cause to believe that SHULMAN did knowingly violate 18 U.S.C. §§ 2251(a); 2252A(a)(2)(A); and 2252A(a)(5)(B).

#### **BACKGROUND OF INVESTIGATION**

- 5. In May 2021, an undercover New York State Police (NYSP) Investigator (the UC), operating in the Western District of New York, engaged in an investigation to identify individuals using the Kik Messenger application to engage in criminal sexual activity with children. Kik Messenger is an internet and mobile messaging application that allows users to communicate in and affecting interstate and foreign commerce via the internet. Kik is known by law enforcement as a platform on which individuals trade child pornography and engage in the sexual exploitation of children. The UC posed as an 11-year-old female and the UC's public profile contained a photograph depicting a female of that approximate age.
- 6. On May 4, 2021, the UC received a message from user "LazuliKnight" with a display name of "M Knight." The account's profile picture depicted a white male with brown/green eyes and brown hair, wearing a necklace with metal balls on it. The male (later identified to be MATTHEW SHULMAN) identified himself as "Matt," a 28-year-old in Rochester, NY. The UC immediately advised "Matt" that the UC was 11 years old. "Matt" replied that the child's age did not bother him but expressed concern that the child was actually a police officer. During this initial conversation, "Matt" stated: "you going to make a boy very happy one day being as cute as you are" and asked for a picture of the child. The UC replied with a law enforcement approved photograph of the same apparent 11-year-old child that was depicted in the UC's public profile. "Matt" then sent a picture of himself

holding a card that had "5/4/21" written on it. "Matt" also provided his phone number as 585-210-XXXX, at which point the conversation switched to text messaging.

- 7. Between May 4, 2021 and May 5, 2022, "Matt" exchanged approximately 4,671 text messages with the UC, which were often sexual in nature. During the conversations, "Matt" instructed the child to masturbate, requested pictures of the child's vagina, sent pictures of his penis to the child, discussed meeting the child in person to engage in sexual intercourse, and distributed child pornography to the child, all in violation of 18 U.S.C. §§ 2251(a); 2252A(a)(2)(A); and 2252A(a)(5)(B).
- 8. For example, on May 6, 2021, "Matt" engaged in the following exchange with the UC:<sup>1</sup>

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<sup>&</sup>lt;sup>1</sup> Messages from "Matt" to the UC are designated as "Incoming" and messages from the UC to "Matt" are designated as "Outgoing."

2021/05/06	02:11:15	PM ED	585-210-5999	SMS	Incoming	Can I ask a personal question? Have you ever done anything with a boy before?
2021/05/06	02:18:48	PM ED	585-210-5999	SMS	Incoming	You don't have to answer that if it makes you uncomfortable.
2021/05/06	04:45:48	PM ED	585-210-5999	SMS	Outgoing	Sorry my phone died and i couldnt find my charger
2021/05/06	04:46:14	PM ED	585-210-5999	SMS	Outgoing	No  do u think im stupid now?
2021/05/06	04:48:38	PM ED	585-210-5999	SMS	Incoming	It's ok, I don't think you're stupid. I was just wondering that's all silly. My first time being with a girl wasn't until I turned 12.
2021/05/06	05:00:19	PM ED	585-210-5999	SMS	Outgoing	Oh what did u do when u were 12
2021/05/06	05:06:44	PM ED	585-210-5999	SMS	Incoming	Being honest, we did everything
2021/05/06	05:07:05	PM ED	585-210-5999	SMS	Incoming	I was 12 and she was 14
2021/05/06	06:05:43	PM ED	585-210-5999	SMS	Outgoing	Like whats everything
2021/05/06	06:17:30	PM ED	585-210-5999	SMS	Incoming	Well, we kissed and made about. We got to touch each other all over, got to see each other naked and have sex. She taught me a lot about what she liked that made her feel good, and she showed me different things that she did to me that made me feel

2021/05/06	07:00:38	PM ED	585-210-5999	SMS	Incoming	Do you ever masturbate or rub yourself? That's a way that girls can make the orgasm feeling happen too
2021/05/06	07:01:51	PM ED	585-210-5999	SMS	Incoming	Boys your age and older masturbate to make themselves orgasm a lot
2021/05/06	07:02:06	PM ED	585-210-5999	SMS	Incoming	I do too 😉
2021/05/06	07:14:27	PM ED	585-210-5999	SMS	Outgoing	Oh i nevs done rhat b4 i dont even know how
2021/05/06	07:16:25	PM ED	585-210-5999	SMS	Incoming	It's alright if you haven't. Have you ever touched and played around down there at all? There's certain places you can touch and rub that will give you those pleasure feelings.
2021/05/06	07:23:16	PM ED	585-210-5999	SMS	Outgoing	No not really. Like were
2021/05/06	07:23:51	PM ED	585-210-5999	SMS	Incoming	Do you know where the top of your clit is?
2021/05/06	07:26:01	PM ED	585-210-5999	SMS	Outgoing	No

2021/05/06	07:27:53	PM ED	585-210-5999	SMS	Incoming	Its ok. It's hard for me to explain where, but if you want me to show you better, I have an idea. But, you'd have to do something you might not be comfortable with.
2021/05/06	07:33:32	PM ED	585-210-5999	SMS	Outgoing	What??
2021/05/06	07:35:33	PM ED	585-210-5999	SMS	Incoming	Well, each girls vagina looks different from each other, so if I were to see yours, then I could show you the spot you can rub to possibly make the orgasm feeling happen. But I'll understand if that makes you uncomfortable and you don't want to.
2021/05/06	07:36:31	PM ED	585-210-5999	SMS	Incoming	There's other ways that girls can make the orgasm feeling happen too
2021/05/06	07:37:49	PM ED	585-210-5999	SMS	Incoming	Same for boys too, each penis looks different and use different ways to make the orgasm feeling happen too

2021/05/06	07:38:53	PM ED	585-210-5999	SMS	Outgoing	Like gma is here rn so u couldnt come here 2 see it
2021/05/06	07:39:39	PM ED	585-210-5999	SMS	Incoming	Lol I'm not asking to come over. I meant you take a pic when you had private time and I could show you using the pic
2021/05/06	07:43:50	PM ED	585-210-5999	SMS	Outgoing	Oh sorry like a pic of my vagina?
2021/05/06	07:45:13	PM ED	585-210-5999	SMS	Incoming	Yeah that's what I meant, like a close up of it. But like I said before, if you don't want to I'll understand. It'll just be easier for me to show you if you wanted to see where it was on yourself

<sup>&</sup>quot;Matt" also told the child to look at porn on the website "Pornhub" during this conversation.

- 9. By directing the child to take a photograph of her vagina and share it in order for SHULMAN to teach the child how to masturbate, SHULMAN attempted to produce, receive, and possess child pornography in violation of 18 U.S.C. §§ 2251(a), 2252A(a)(2)(A), and 2252A(a)(5)(B).
- 10. On May 17, 2021, "Matt" sent a picture of his erect penis in connection with the following text exchange:

2021/05/17	10:02:31	PM ED	585-210-5999	SMS	Outgoing	Is that really u??? 🚳
2021/05/17	10:03:13	PM ED	585-210-5999	SMS	Incoming	Yes that's my cock lol. That's
						what it looks like when I'm
						hard and turned on

11. On May 24, 2021, "Matt" sent another picture of his penis with the message: "[h]ere's what I see when I look down."

## 12. On June 1, 2021, "Matt" wrote:

2021/06/01	04:14:57 PM ED	585-210-5999	SMS	Incoming	I've asked before and I know you don't like the idea, but doing this would prove to me you're not an undercover police
2021/06/01	04:14:59 PM ED	585-210-5999	SMS	Outgoing	K well i promise i didnt tell gma or any cops bout us
2021/06/01	04:16:08 PM ED	585-210-5999	SMS	Incoming	To prove it to me, I'd need you to take a selfie. Either a naked selfie of some kind of a selfie in your underwear and nothing else on. Police can't send those so if you do, then I'll know you're not police and I can fully trust you
2021/06/01	04:19:50 PM ED	585-210-5999	SMS	Incoming	Like I know you said you didn't want to send any of those until after meeting, but by sending either a selfie of you nude, or a selfie of you in your underwear, then I'll know you're real and that I won't get in trouble
2021/06/01	04:33:42 PM ED	585-210-5999	SMS	Incoming	It's the only way I can think of to prove I won't get in trouble for coming to see you, unless you have any other ideas aside from that?

2021/06/01	05:25:58	PM ED	585-210-5999	SMS	Incoming	Just think, once I can fully trust you I can do all sorts of cool things for you whenever you like or ask
2021/06/01	05:29:30	PM ED	585-210-5999	SMS	Outgoing	Cool stuff like what
2021/06/01	06:11:13	PM ED	585-210-5999		Incoming	Well, I could do things like share my Netflix account so you could have new things to watch, I could order you a pizza when your gma isn't home if you're hungry and I can have it delivered to you, drive you places that you want to go after we meet, maybe buy you some thing if there's something you want. Those are just some ideas.
2021/06/01	08:03:58	PM ED	585-210-5999	SMS	Outgoing	4 reals u would do that 4 me??!?!?
2021/06/01	08:06:15	PM ED	585-210-5999	SMS	Incoming	Of course I would
2021/06/01	08:32:37	PM ED	585-210-5999	SMS	Outgoing	That would be crazy awesome!!

- 13. On June 21, 2021, "Matt" began sending UC images and videos of child pornography in violation of 18 U.S.C. § 2252A(a)(2)(A).
- 14. Specifically, on June 21, 2021 "Matt" sent the following images of child pornography to the UC:
  - a. **Image #1:** a collage of five pictures showing a prepubescent male child and a prepubescent female child exposing their nude genitals and anuses in a lascivious manner.
  - b. **Image #2:** a collage of sixteen pictures depicting a prepubescent male child's penis being inserted into a prepubescent female child's vagina.
  - c. **Image #3:** a collage of four pictures depicting a prepubescent female child inserting a highlighter into her vagina.

- 15. On June 25, 2021, "Matt" sent a collage of child pornography images depicting a prepubescent female child inserting various objects into her vagina, and a dog placing its nose against the child's vagina.
- 16. On July 6, 2021, "Matt" sent a collage of images depicting an approximately 10-year-old female child inserting a foreign object into her vagina.
- 17. On June 21, 2021, "Matt" (SHULMAN) engaged in a 24-minute phone conversation with a NYSP Trooper, who the defendant believed was the child. During the conversation, SHULMAN talked about teaching the child about sex. The child responded that she was scared that SHULMAN would make fun of her because she "doesn't know how to do anything." SHULMAN assured the child that he would not make fun of her and that he could teach her how to "do things." SHULMAN talked about meeting the child, saying that he would bring her a "milkshake." SHULMAN asked the child what she would like to do when they meet, to which the child responded that she wanted to do the things "in the pictures," referring to the child pornography that SHULMAN had previously sent to the child as described above. SHULMAN then said that there were a lot of things shown in the pictures, and asked the child to specify what sex acts she wanted to try with SHULMAN. The child ultimately said that she wanted to try "sex" to which SHULMAN replied that they won't be able to try that "for a little bit" because his "penis is a lot bigger than the boy's penis that [she] saw in the picture" referring to the child pornography that SHULMAN had sent to the child. SHULMAN explained that his penis would hurt the child unless her vagina got a little bigger. SHULMAN then said that since he never saw the child's vagina, he can't say whether his penis would hurt the child or not. As the conversation continued, SHULMAN talked to the child about masturbating and asked her masturbate using a pen and her finger

while on the phone with him. SHULMAN told the child that this was his way of "teaching" her how to engage in these activities so that the child could be ready for them to meet. During the conversation, SHULMAN told the child that talking to her was making his "penis really hard." As the conversation continued, SHULMAN talked to the child about her dog, and then told the child that some girls let their "dog lick between their legs," and that some girls "like it a lot." When the child said that she'd never done that before, SHULMAN told the child that she could look it up on the internet.

18. On August 26, 2021, SHULMAN engaged in the following conversation in which he planned to meet the child for sex:

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2021/08/26	09:30:58 PM ED	585-210-5999	SMS	Incoming	So you're ok with me wanting to do adult things with you like seeing each other naked and sex and things like that?
2021/08/26	09:39:00 PM ED	585-210-5999	SMS	Outgoing	Yea like long as u show me how so idont feel fum not knowin sumthin
2021/08/26	09:40:30 PM ED	585-210-5999	SMS	Incoming	Have you tried looking up anything on the internet or talked with friends so you have an idea of what boys and girls do together?
2021/08/26	09:41:19 PM ED	585-210-5999	SMS	Outgoing	Well like i know what boy and girls do we talked bout it lol
2021/08/26	09:44:06 PM ED	585-210-5999	SMS	Incoming	Lol yeah I know we talked a lil bout it. Was there anything that sounded fun or that you're excited to see or try out?
2021/08/26	09:45:18 PM ED	585-210-5999	SMS	Outgoing	I think im excited 2 learn stuff but i dont kniw what will b funnest til i try it
2021/08/26	09:47:28 PM ED	585-210-5999	SMS	Incoming	Are you sure you'd be ok with us getting naked and touching, feeling and kissing each other all over?

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2021/08/26	09:48:56	PM ED	585-210-5999	SMS	Outgoing	Yea i mean if u r naked 2 i will be ok but like if just i was naked i think id feel weird
2021/08/26	09:57:36	PM ED	585-210-5999	SMS	Incoming	Lol yeah I'd feel weird if it was just you too. Does having my fingers or mouth on your vagina sound like something you'd try?
2021/08/26	10:01:54	PM ED	585-210-5999	SMS	Outgoing	Yea id def try it. Like that sounds the easiest cuz u said i just have 2 lay there right
2021/08/26	10:04:53	PM ED	585-210-5999	SMS	Incoming	Yeah you can if you want, or we could do it to each other at the same time. My mouth on your pussy and your mouth on my cock. It's called 69
2021/08/26	10:06:02	PM ED	585-210-5999	SMS	Outgoing	Oh 4 reals??? Is it hard?
2021/08/26	10:08:27	PM ED	585-210-5999	SMS	Incoming	I don't think it is, we would just lay on top of each other facing opposite so my mouth can reach your pussy and your mouth could reach my cock at the same time. It'd feel really good for both of us, and some girls really like doing that

2021/08/26	10:09:42 P	M ED	585-210-5999	SMS	Incoming	I'd probably be on my back while you sat down on my face leaning forward towards my cock
2021/08/26	10:12:30 PI	M ED	585-210-5999	SMS	Outgoing	Ok like I'll try it but like u probs have 2 show me how b4 i get
2021/08/26	10:14:10 Pl	M ED	585-210-5999	SMS	Incoming	A few things would happen. I would be kissing licking and sucking on your pussy and pushing my tongue up inside your vagina
2021/08/26	10:15:19 PI	M ED	585-210-5999	SMS	Incoming	And as a girl, you would get to learn how to give a handjob and if you want to try it, you could learn how to give a blowjob too, if you know what those are
2021/08/26	10:16:11 P	M ED	585-210-5999	SMS	Outgoing	Yeah i know what they r lol
2021/08/26	10:17:03 P	M ED	585-210-5999	SMS	Outgoing	Like r we really gonna do this or u r just talkin bout it
2021/08/26	10:17:12 P	M ED	585-210-5999	SMS	Incoming	It's ok if you didn't know, I would tell you and not make fun of you for it
2021/08/26	10:18:09 P	M ED	585-210-5999	SMS	Incoming	Do what? Have sex?
2021/08/26	10:19:01 P	M ED	585-210-5999	SMS	Outgoing	No like r we really gonna meet and try 69 and hamd jobs and blow jobs
2021/08/26	10:19:53 P	M ED	585-210-5999	SMS	Incoming	I mean, if we meet then yes

19. Between August and October 2021, conversation became sporadic in nature. On October 14, 2021, SHULMAN engaged in the following communications, showing his continued interest in the child:

2021/10/14	10:13:33 AM ED	585-210-5999	SMS	Outgoing	Well I still love u and miss u.
					Its ok if u dont but just tellin u
2021/10/14	10:17:40 AM ED	585-210-5999	SMS	Incoming	I appreciate that. I still love
ı					you and miss you too 🕤
2021/10/14	12:23:12 PM ED	585-210-5999	SMS	Incoming	Have you made any plans for
i					Halloween yet?
2021/10/14	01:41:22 PM ED	585-210-5999	SMS	Outgoing	No probs wont do anything
2021/10/14	01:44:52 PM ED	585-210-5999	SMS	Incoming	Aww how come? Do you not
					like Halloween?
2021/10/14	03:32:18 PM ED	585-210-5999	SMS	Outgoing	Well like im 12 now. Kinda 2
					old 2 trick or treat
2021/10/14	03:33:18 PM ED	585-210-5999	SMS	Incoming	I mean, I guess that's your
					choice. I didn't end up
					stopping til I was like, 14 or
					15. It's hard to pass up on free
					candy lol

- 20. In December 2021, SHULMAN again discussed meeting with the child and made tentative plans to meet when the child's grandmother would not be home. As the meeting date grew closer, SHULMAN told the child that he could not meet due to mechanical issues with his car. Similar conversation took place from December 2021 through April 2022 via text messaging.
- 21. As of April 14, 2022, "Matt" was still communicating with the UC. On that day "Matt" instructed the UC to download the messaging application Telegram and create an account. Telegram is an internet-based messaging application, that allows individuals to exchange messages and media, such as photographs, via the internet. Telegram is known by law enforcement as a means by which pedophiles exchange child pornography.
- 22. The UC created a Telegram account as instructed, at which point "Matt" sent the UC three videos of child pornography as defined by 18 U.S.C. § 2256(8):

- a. **Video #1:** The first video is 3 minutes and 30 seconds in length. It depicts a female child approximately 10-years-old inserting a hot dog in her vagina.
- b. **Video #2:** The second video is 3 minutes and 4 seconds in length. It depicts a female child approximately 12-years-old performing oral sex on a prepubescent male child. The two then engage in sexual intercourse.
  - i. "Matt" sent a message with this video stating: "Here's a vid of a girl and boy doing a bunch of things together. The girl is 13 and the boy is 12."
- c. **Video #3:** The third video is 1 minute and 34 seconds in length. It depicts a female performing oral sex on a prepubescent female child.
  - i. "Matt" sent a message with the video that stated: "I want to do both of these things to you too. The girls are between 10 and 12."
- 23. As of May 30, 2022, "Matt" was still communicating with the UC. "Matt" asked to meet the child for sex in the area of Waterloo, NY on Memorial Day, May 30, 2022. This date was selected in part, because "Matt" believed that the child would not have school due to the holiday. The meeting was ultimately cancelled when "Matt" claimed that his car had been damaged in an accident.

#### **IDENTIFICATION OF MATTHEW SHULMAN**

24. According to records obtained by the NYSP, 585-210-XXXX (the number used to communicate with the UC), is subscribed to MATTHEW SHULMAN, a level 1 registered sex offender in New York State. According to SHULMAN's sex offender registration and criminal history, he is currently serving a probation sentence with the Monroe County Probation Department based on a 2016 state conviction for Possessing a Sexual Performance by a Child. Shulman's probation term is set to expire in 2026. SHULMAN's arrest and sex offender registry photographs depict the same person that is depicted in the photograph that "Matt" sent to the UC as detailed above. In his arrest photograph from 2016, SHULMAN

also appears to be wearing the same metal ball necklace that he used while communicating with the UC.

- 25. SHULMAN's registered address is listed 331 Colebourne Rd. Rochester, NY 14609, and SHULMAN's registered phone number is 585-210-XXXX. On May 24, 2022, the Monroe County Probation Department further confirmed that SHULMAN continues to use phone number 585-210-XXXX and continues to reside at the Colebourne Rd. home. SHULMAN's probation officer was shown the photograph that "Matt" sent to the UC on May 4, 2021 holding a card that had "5/4/21" written on it and confirmed that "Matt" is probationer MATTHEW SHULMAN.
- 26. On June 7, 2022, the NYSP and members of Homeland Security Investigations executed a search warrant at 331 Colebourne Rd. SHULMAN was the sole occupant in the home at the time the warrant was executed. SHULMAN was encountered in the bathroom of the residence where he was taking a shower. During the search of the home, officers located multiple digital devices, to include 2 laptop computers, 3 cellular phones, and other storage devices such as thumb drives and an external hard drive. One cell phone, a OnePlus make, was located in the bathroom on SHULMAN's person. These items will be forensically examined by members of Homeland Security.
- 27. According to SHULMAN's probation officer, SHULMAN violated multiple conditions of his probation by the above conduct. by possessing internet devices without permission; accessing internet social media applications without permission; communicating with minors; viewing pornography; possessing child pornography; and failing to comply with his sex offender registration requirements.

28. SHULMAN's probation officer further advised that SHULMAN only had

permission to utilize a flip phone and that his use/possession of the other devices listed above

was prohibited.

29. SHULMAN also violated New York State Corrections Law § 168-a related to

his sex offender registration requirements, by failing to report his Kik and Telegram social

media accounts. The NYSP will coordinate with the Monroe County Sheriff's Office to

investigate and charge those offenses as appropriate.

**CONCLUSION** 

30. Based upon the forgoing, I respectfully submit that there is probable cause to

believe that SHULMAN knowingly violated 18 U.S.C. §§ 2251(a); 2252A(a)(2)(A); and

2252A(a)(5)(B).

GREGORY F. SCHMITTER

Task Force Officer

Homeland Security Investigations

Affidavit submitted electronically by email in .pdf format. Oath administered, and contents and signature attested to me as true and accurate telephonically pursuant

to Fed. R. Crim. P. 4.1 and 4(d)

on June 7, 2022.

MARK W. PEDERSEN

United States Magistrate Judge

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